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January 29, 2025

VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St. Courtroom 15
New York, NY 10007-1312

Re: Wang v. Sussman et al., No. 1:24-cv-03987-AS

Dear Judge Subramanian:

The request is GRANTED.

The Clerk of Court is
directed to terminate the
motion at Dkt. 75.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.
Dated: January 30, 2025

We represent Defendants Sammy Sussman, Vox Media, LLC, and New York Media LLC (collectively, “Defendants”), in the above-referenced action. In response to the Court’s January 28, 2025 Order granting Defendants’ prior letter-motion to seal, *see* ECF No. 74, Defendants write to clarify their previous *ex parte* submission and to submit a new, updated *ex parte* filing that complies with the Court’s Individual Rule 11(C)(iii).

In Defendants’ recent *ex parte* filing containing billing statements, *see* ECF No. 73-5, we redacted descriptions of fees that we did not claim in our motion, *see* ECF No. 71. Our updated *ex parte* filing accompanying this letter includes (1) those same redactions, in black, for items for which we do not seek fees; and (2) additional highlighting, in yellow, indicating privileged or confidential information relating to the items for which we *do* seek fees, *see* Individual Rule 11(C)(iii). In the public version, all of this information is marked as redacted in black with privilege and confidentiality designations. *See* ECF No. 72-5.

For the same reasons outlined in our prior letter-motion to seal, *see* ECF No. 68, Defendants respectfully request that the Court permit us to make this additional *ex parte* filing. The parties are not scheduled to appear before the court.

Respectfully submitted,

Davis Wright Tremaine LLP

/s/ Katherine M. Bolger

Katherine M. Bolger

cc: Counsel of Record (via ECF)

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